

**THE STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL'S CORE
STRATEGY DPD
INDEPENDENT EXAMINATION**

**Comments and suggested amendments to the Main Modifications
for the Council's consideration (no further public submissions will
be accepted)**

Following detailed consideration of the representations submitted on the Main Modifications proposed by the Council. I have the following general comments:

- In general terms the proposed Main Modifications address the issues of soundness raised in my Initial Conclusions, subject to the comments and amendments set out below;
- Generally, the early review of Core Strategies cannot be supported and goes against the concept of plans aimed at providing guidance and certainty over the longer term. In this respect I have a great deal of sympathy with those opposed to the idea of an early review. However, circumstances in respect of the examples of core strategies brought to my attention are different to the case of the Staffordshire Moorlands Core Strategy, and I consider there is little to be gained by delaying its adoption whilst the evidence base is updated, including a review of the Strategic Housing Market Assessment;
- The development rates included in Policy SS2 continue to be a matter of concern. The plan can only be found sound, subject to an early review, if it can provide a sound basis for development in the period up to review. The Council's own additional evidence, dated June 2013, (para 1.10) indicates a residual requirement for the period to 2016 of 933 dwellings – equivalent to an annual requirement of 311, whereas the table provided in M8 retains a development rate of 220 dpa. The Council's arguments that this reflects the latest projected household growth rates, as well as anticipated land supply, and will be followed by a significant uplift in the rate of development post 2016, are not wholly convincing. This cannot be a sound policy for the immediate future and the average rate for the period 2013 – 2016 would have to be significantly higher in order to meet the overall requirement for the 5 year period, particularly in view of the need for a 20% buffer (NPPF, para 47). The latest housing land supply monitoring shows a deliverable supply of 1,163 dwellings with planning permission or are under construction, whilst the 20% buffer would indicate a requirement of at least 1,320 (1,100 + 220). However, this does not include sites uncommitted sites identified in the SHLAA which may be deliverable over the short term. In my view additional text is necessary both within the Policy and in the supporting text;

- I appreciate that it has not been possible to reach full agreement with parties on some proposed Main Modifications, although I have noted that some progress has been, notably towards understanding the concerns of those opposed to the Core Strategy's policy stance on the Churnet Valley. However, it appears to me that the Masterplan – which is currently out for consultation – will provide detailed policies and guidance for the Churnet Valley, and the Core Strategy policies should therefore concentrate on providing an overarching framework for development;
- The NPPF does not require prioritising the re-use of previously developed land (brownfield) sites over greenfield as a Core Planning Principle, it simply indicates that planning policies should encourage the effective use of land by re-using brownfield land (para 111). There are a number of instances where policies or supporting text indicate that priority or preference will be given to brownfield land. These should be amended in line with national policy in order to be found sound;

I will be considering amendments to the Main Modifications as follows and invite the Council's comments.

- M8: Additional text below the table as follows: "Although the table shows an average annual development rate of 220 for the period 2011 – 2016, only 167 dwellings have been completed in the first 2 years. It follows that the annual development rate for the period 2013 - 2016 will have to increase significantly in order to complete 1,100 dwellings over the whole period. This is reflected in row 2: the projected completions on committed sites, in Appendix G – Housing Trajectory. Additionally, as a result of the significant underperformance in dwelling completions in years 2011 – 2012, the Council will ensure a supply of deliverable land for 1,320 dwellings to provide a 20% buffer supply, added to the 5 year requirement to 2016."
- M9: Amend text as follows: ~~"..for the period 2006 – 2026 which is expected to more than meet the projected household increase..."~~ and:
"..plan period to ensure that the ~~6,000 dwellings target is not excessively exceeded to prevent undermining the North Staffordshire MUA is not undermined.~~"
- M11: Amend text as follows: "The development rate for 2011 – 2016 reflects the latest projected household growth rates ~~which indicate a reduced level of household growth to 2021~~ as well as reflecting anticipated housing land supply and completions to 2016".
- M15: Add the following text: "The Housing Trajectory (Appendix G) shows a significant underperformance in dwelling completions for the years 2011 -2012 so that, in accordance with the requirements

of the NPPF (para 47), the Council will ensure that a 20% buffer supply will be added to the 5 year requirement to 2016."

M24: 2nd bullet: amend text as follows: "..with priority encouragement being given to previously developed (brownfield) sites..."

M29: 2nd bullet: amend text as follows: "..with priority encouragement being given to previously developed (brownfield) sites..."

M32: Amend text as follows: "..In identifying sites preference encouragement will be given to the use of brownfield sites.."

M39: Amend text of 3rd bullet as follows: "Allowing suitable enabling development which would secure..."

(Whilst not a matter of soundness, the Council may wish to include a reference to the Staffordshire Farmstead Guidance in the supporting text as a minor amendment).

M44: Amend text of 3rd bullet as follows: "measures to enhance, protect and interpret the landscape character and heritage assets of the Churnet Valley."

and:

Amend text as follows: "Complementary and sensitive highway improvements ~~of~~to access routes and/or measures to support alternative means of access will be required to serve any developments which generate significant additional demand for travel."

M47 Delete text as follows: ~~"Tourism growth would be based around attracting 'Countrysiders' visitor sector, who best fit the offer of promoting enjoyment of the countryside and heritage and are most likely to be attracted by a rural destination, and to a lesser extent the 'family fun' visitor sector, predominantly based on the existing attraction of Alton Towers."~~

and:

Amend text as follows: "Any expansion of Alton Towers will be determined through the Masterplan, including the long term need for and feasibility of constructing a Relief Road or other highway improvements. ~~(part of the proposed route falls within the Moorlands) so that traffic through those areas associated with Alton Towers can be relieved. It is accepted that it may not be feasible to construct a Relief Road due to environmental and land ownership issues, engineering difficulties and its limited viability in financial terms and therefore other effective interventions funded by the Alton Towers resort are expected to be necessary."~~

M49: Amend text as follows: "..They also promote preference encourage for development on previously-developed land.."

M50 Amend text as follows: "..Giving preference Encouragement will be given to development on previously developed land.."

and:

~~"Only in exceptional circumstances would d~~ Development on non-
~~allocated greenfield land be given preference. These are where the~~
~~proposal~~ will only be considered acceptable where the proposal:

M58: Delete ~~"..It would only be in exceptional circumstances that a non-~~
~~allocated greenfield site would be given preference."~~

M75: Delete ~~".. — but in a way which also respects the interests of the~~
~~settled community."~~

Patrick Whitehead
Inspector

4 October 2013